

**IN THE UNITED STATES COURT OF APPEALS  
FOR THE ELEVENTH CIRCUIT**

G4S REGULATED SECURITY SOLUTIONS,	)	
A Division of G4S SECURE SOLUTIONS (USA)	)	
INC., F/K/A THE WACKENHUT	)	
CORPORATION,	)	
	)	
Petitioner-Cross Respondent,	)	Case No. 15-13224
	)	
vs.	)	
	)	
NATIONAL LABOR RELATIONS BOARD,	)	
	)	
Respondent-Cross Petitioner.	)	

**PETITIONER/CROSS RESPONDENT’S UNOPPOSED MOTION FOR  
EXTENSION OF TIME TO FILE PETITIONER/CROSS-RESPONDENT’S  
BRIEF**

Petitioner/Cross-Respondent G4S Regulated Security Solutions, A Division of G4S Security Solutions (USA) INC., F/K/A The Wackenhut Corporation (hereinafter, “G4S”), by and through its undersigned counsel, hereby moves the Court for a fourteen (14) day extension, through and including October 21, 2015, of its deadline by which to file and serve its brief. Undersigned counsel has conferred with counsel for Respondent/Cross-Petitioner, and opposing counsel has no objection to the requested extension. In support of this motion, G4S states as follows:

1. Under the current briefing schedule, G4S’ brief is required to be filed and served on or before October 7, 2015.

2. G4S' lead counsel, Jonathan Spitz, has been intimately involved with the underlying proceeding before the National Labor Relations Board and is well versed in the facts and circumstances of this action. Mr. Spitz will be the principal author of G4S' brief. Daniel Schudroff, an associate who was also intimately involved in the proceeding before the National Labor Relations Board, will have primary drafting responsibilities.<sup>1</sup> Mr. Schudroff was on vacation the week immediately following the issuance of the Court's briefing notice and did not return to the office until September 8, 2015. Additionally, Mr. Schudroff is out of the office several days this month to celebrate religious holidays. These circumstances will prevent undersigned counsel from completing G4S' brief within the current deadline.

3. The undersigned counsel is working diligently to prepare its brief. Accordingly, this motion is brought in good faith and not for purposes of delay.

4. Based on the foregoing, undersigned counsel seeks a fourteen (14) day extension—through and including October 21, 2015—within which to file and serve its brief.

5. G4S' counsel has conferred with opposing counsel, and opposing counsel has no objection to the relief sought through this motion.

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<sup>1</sup> Mr. Schudroff is in the process of obtaining the necessary paperwork for admission to the United States Court of Appeals for the Eleventh Circuit and will enter an appearance on behalf of G4S as soon as possible.

Accordingly, G4S respectfully requests that the Court enter an order granting its motion for a fourteen (14) day extension of its deadline to file and serve its brief through and including October 21, 2015.

Respectfully submitted this 15th day of September, 2015.

By: /s/ Jeffrey A. Schwartz  
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Jonathan J. Spitz  
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**CERTIFICATE OF INTERESTED PERSONS**

The undersigned counsel of record for Petitioner/Cross-Respondent G4S Regulated Security Solutions, A Division of G4S Security Solutions (USA) INC., F/K/A The Wackenhut Corporation, certifies that the following listed parties have an interest in the outcome of this case:

1. Cherof, Edward M. (Attorney for Petitioner);
2. Diaz, Margaret J. (Regional Director National Labor Relations Board, Region 12);
3. Frazier, Thomas (Charging Party);
4. G4S Regulated Security Solutions, A Division of G4S Security Solutions (USA) INC., F/K/A The Wackenhut Corporation (Petitioner);
5. Hirozawa, Kent Y. (Member);
6. Mack, Cecil (Charging Party);
7. Miscimarra, Phillip A. (Member);
8. Pearce, Mark Gaston (Chairman);
9. Plass, Shelley B. (Counsel for the Acting General Counsel National Labor Relations Board);
10. Schwartz, Jeffrey A. (Attorney for Petitioner); and
11. Spitz, Jonathan J. (Attorney for Petitioner).

Respectfully submitted this 15th day of September, 2015.

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**CERTIFICATE OF SERVICE**

I hereby certify that on September 15, 2015, I caused to be served a true and correct copy of the within and foregoing **PETITIONER/CROSS-RESPONDENT'S UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE PETITIONER/CROSS-RESPONDENT'S BRIEF** via the Court's electronic case filing system which will automatically serve the following counsel of record:

Linda Dreeben, Esq.  
Deputy Associate General Counsel  
Usha Deenan, Esq.  
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I hereby certify that on September 15, 2015, I caused to be served a true and correct copy of the within and foregoing **PETITIONER/CROSS-RESPONDENT'S UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE PETITIONER/CROSS-RESPONDENT'S BRIEF** via electronic mail and U.S. Mail upon the following parties:

Mr. Thomas Frazier  
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